

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA,

-against-

12-cr-652 (MHD)

JOANNE SIMMONS

Defendant.

----- x
**NOTICE OF MOTION TO BE
RELIEVED AS COUNSEL FOR
DEFENDANT**

Please take notice that, upon the accompanying declaration of Michael P. Kushner, Esq., sworn to December 12, 2014, and all prior proceedings had herein, the undersigned shall move this Court, before the Honorable Michael H. Dolinger, on a date to be designated by the Court, for an order, pursuant to Local Civil Rule 1.4, relieving the undersigned as counsel for defendant.

Dated: December 12, 2014

/s

Michael P. Kushner, Esq.
KUSHNER LAW GROUP, PLLC
Attorney for Defendant
16 Court Street, Suite 2901
Brooklyn, New York 11241
718.504.1440 (tel)

To: Defendant Joanne Simmons (by First Class Mail, Certified, Return Receipt)
Christine Magdo, Esq., Assistant United States Attorney (by ECF)
Michele Greer Bambrick, Senior United States Probation Officer (by Email)